

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: LOWER MANHATTAN DISASTER SITE
LITIGATION

-----X 07CV4459(AKH)
RODRIGO CAMPOZANO AND ESTER CAMPOZANO,

Plaintiffs,

- against -

ANSWER TO
AMENDED
COMPLAINT

110 CHURCH LLC, 120 BROADWAY CONDOMINIUM
(CONDO #871), 120 BROADWAY HOLDING LLC,
120 BROADWAY PROPERTIES LLC, 120 BROADWAY LLC,
50 TRINITYLLC, 53 PARK PLACE LLC, 715 REALTY
CORP., 88 GREENWICH LLC, 90 CHURCH STREET LIMITED
PARTNERSHIP, AJ GOLDSTEIN & CO.,
ALAN KASMAN DBA KASCO,
ALLBRIGHT PARKING MANAGEMENT INC.,
AMBIENT GROUP INC.,
ANN TAYLOR STORES CORPORATION, BANKERS TRUST COMPANY,
BANKERS TRUST CORP., BANKERS TRUST NEW YORK CORPORATION,
BATTERY PARK CITY AUTHORITY,
BELFOR USA GROUP INC.,
BETTY JEAN GRANQUIST,
BLACK DIAMONDS LLC,
BLACKMON-MOORING-STEAMATIC CATASTOPHE, INC.
D/B/A BMS CAT,
BOARD OF EDUCATION OF THE CITY OF NEW YORK,
BOARD OF MANAGERS OF THE 120 BROADWAY CONDOMINIUM
(CONDO #871),
BOARD OF MANAGERS OF THE HUDSON VIEW EAST CONDOMINIUM,
BOSTON PROPERTIES INC.,
BROADWAY WEST STREET ASSOCIATES LIMITED PARTNERSHIP,
BROOKFIELD FINANCIAL PROPERTIES, INC.,
BROOKFIELD FINANCIAL PROPERTIES, LP
BROOKFIELD PARTNERS, LP, BROOKFIELD
PROPERTIES CORPORATION, BROOKFIELD PROPERTIES
HOLDINGS INC., BT PRIVATE CLIENTS CORP.,
CAROL GAYNOR TRUST,
CAROL GAYNOR AS TRUSTEE OF THE CAROL GAYNOR TRUST,
CAROL MERRIL GAYNOR,
CENTRAL PARKING SYSTEM OF NEW YORK, INC.,
CITIBANK NA,

DEPARTMENT OF BUSINESS SERVICES,
DEUTSCHE BANK TRUST COMPANY, DEUTSCHE BANK TRUST COMPANY
AMERICAS, DEUTSCHE BANK TRUST CORPORATION,
EDISON PARKING MANAGEMENT LP,
EMPIRE STATE PROPERTIES INC.,
ENVIROTECH CLEAN AIR, INC.,
FGP 90 WEST STREET INC.,
FRED GOLDSTEIN,
GPS ENVIRONMENTAL CONSULTANTS, INC.,
HARLAND GAYNOR AS TRUSTEE UNDER A DECLARATION OF TRUST,
HAROLD G. GOLDSTEIN AS TRUSTEE UNDER A DECLARATION OF TRUST,
HERMAN L. BLUM AS TRUSTEE UNDER THE LAST WILL
AND TESTAMENT OF LOUIS W. GOLDSTEIN,
HIGHLAND DEVELOPMENT, LLC,
HILLMAN ENVIRONMENTAL GROUP, LLC.,
HUDSON TOWERS HOUSING CO INC.,
HUDSON VIEW EAST CONDOMINIUM,
HUDSON VIEW TOWERS ASSOCIATES,
IDELL GOLDSTEIN, AS TRUSTEE UNDER DECLARATION OF TRUST,
INDOOR ENVIRONMENTAL TECHNOLOGY, INC.,
JONES LANG LASALLE SERVICES INC,
KASCO RESTORATION SERVICES CO.,
KIBEL COMPANIES,
LEFRAK ORGANIZATION INC.,
LIBERTY VIEW ASSOCIATES LP,
LIONSHEAD 110 DEVELOPMENT LLC,
LIONSHEAD DEVELOPMENT LLC,
MARGARET G. WATERS,
MARGUERITE K. LEWIS, AS TRUSTEE UNDER THE LAST WILL
AND TESTAMENT OF LOUIS W. GOLDSTEIN,
MATTHEW A. GELBIN, AS TRUSTEE OF THE GELBIN FAMILY,
MERRILL LYNCH & CO, INC.,
NATALIE S. LEBOW, AS TRUSTEE OF THE JEREMIAH PHILIP LEBOW
REVOCABLE TRUST, NATALIE S. LEBOW, AS TRUSTEE OF
THE JERRY P. LEBOW FAMILY TRUST,
NEW YORK CITY SCHOOL CONSTRUCTION AUTHORITY,
NOMURA HOLDING AMERICA, INC., NOMURA SECURITIES
INTERNATIONAL, INC.,
PAMELA BETH KLEIN, AS TRUSTEE OF THE PAMELA
AND ROWAN KLEIN TRUST,
RY MANAGEMENT CO INC,
RELATED BPC ASSOCIATES INC,
ROWAN K. KLEIN, AS TRUSTEE OF THE PAMELA AND
ROWAN KLEIN TRUST,
RUTH G. LEBOW,
RY MANAGEMENT,

SHIRLEY G. SHOCKLEY AS TRUSTEE UNDER DECLARATION OF TRUST,
SILVERSTEIN PROPERTIES, INC.,
STEEPLECHASE ACQUISITIO

Defendants.

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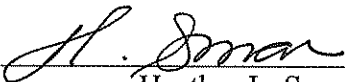
PLEASE TAKE NOTICE that defendant Envirotech Clean Air Inc. ("Envirotech"), as and for their responses to the allegations set forth in the Amended Complaint by Adoption ("Check-off Complaint") related to the Master Complaint filed in the above-referenced action, hereby adopts Envirotech's Answer to the Master Complaint dated August 3, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendant Envirotech demands judgment dismissing the above-captioned action as against each of them, together with costs and disbursements.

Dated: Lake Success, New York
March 7, 2008

Yours, etc.

FRIEDMAN, HARFENIST, LANGER & KRAUT
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BY: 
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